

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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	:	
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u>	:	Case No. 08-35653-KRH
	:	
Debtors.	:	Jointly Administered
	:	Judge Kevin R. Huennekens
-----	X	

**NOTICE OF MOTION TO WITHDRAW AS COUNSEL  
FOR PARKER CENTRAL PLAZA, LTD. AND GALLERIA PLAZA, LTD.**

Hunton & Williams LLP has filed papers with the Court seeking to withdrawal as counsel for Parker Central Plaza, Ltd. and Galleria Plaza, Ltd.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to grant the relief sought in the motion, or if you want the Court to consider your view on the motion, then on or before April 7, 2011, you or your attorney must:

File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the court for filing, you must mail it to the following address early enough so the court will **receive** it on or before the date stated above.

William C. Redden, Clerk  
U.S. Bankruptcy Court

Henry (Toby) P. Long, III [VSB No. 75134]  
HUNTON & WILLIAMS LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, VA 23219-4074  
Telephone: (804) 788-8200  
Facsimile: (804) 788-8218

and

Lynnette R. Warman [Texas Bar No. 20867940]  
Cameron W. Kinvig [Texas Bar No. 24055780]  
HUNTON & WILLIAMS LLP  
1445 Ross Avenue, Suite 3700  
Dallas, TX 75202  
Telephone: (214) 468-3393  
Facsimile: (214) 740-7151

Eastern District of Virginia  
Richmond Division  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

Henry P. (Toby) Long, III  
Hunton & Williams LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, VA 23219

Under Local Bankruptcy Rule 9013-1(H), unless a written response to this motion is filed with the Clerk of Court and served on the moving party within 14 days of the service of this notice, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting the relief.

Dated: March 24, 2011  
Richmond, Virginia

Respectfully Submitted,

/s/ Henry P. (Toby) Long, III  
Henry P. (Toby) Long, III [VSB No. 75134]  
**HUNTON & WILLIAMS LLP**  
Riverfront Plaza, East Tower  
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**MOTION TO WITHDRAW AS COUNSEL FOR  
PARKER CENTRAL PLAZA, LTD. AND GALLERIA PLAZA, LTD.**

Hunton & Williams LLP ("Hunton"), pursuant to Local Bankruptcy Rule 2090-1(G), hereby moves (the "Motion") the Court to enter an order in substantially the form attached hereto as Exhibit A (the "Order") permitting Hunton to withdraw as counsel for Parker Central Plaza, Ltd. ("Parker Central") and Galleria Plaza, Ltd. ("Galleria") for cause.

1. On December 2, 2008, Hunton filed a Notice of Appearance and Request for Service on behalf of Galleria [Docket No. 577].

2. On March 19, 2009, Hunton filed a Notice of Appearance and Request for Service on behalf of Parker Central [Docket No. 2659].

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3. Dalsan Properties, Inc. ("Dalsan") is the parent and manager of both Parker Central and Galleria.

4. Good cause exists for this Motion because Dalsan advised Hunton that it no longer wants Hunton to represent Parker Central and Galleria in these bankruptcy cases and, therefore, requests that Hunton withdraw as counsel to Parker Central and Galleria in this matter.

5. Upon information and belief, Dalsan has retained other counsel to represent Parker Central and Galleria in this matter.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

WHEREFORE, Hunton respectfully requests that the Court enter Order permitting the withdrawal of Hunton as counsel to Parker Central and Galleria in these cases immediately for cause and granting such other relief as is just and appropriate.

Dated: March 24, 2011  
Richmond, Virginia

Respectfully Submitted,

/s/ Henry P. (Toby) Long, III  
Henry P. (Toby) Long, III [VSB No. 75134]  
**HUNTON & WILLIAMS LLP**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of March 2011, I caused the **Notice of Motion to Withdrawal as Counsel for Parker Central Plaza, Ltd. and Galleria Plaza, Ltd.** and the **Motion to Withdrawal as Counsel for Parker Central Plaza, Ltd. and Galleria Plaza, Ltd.** to be served upon the parties on the Court's ECF service list via the Court's electronic case filing system and by United States Mail, postage pre-paid, to Parker Central and Galleria at the address below.

Wayne Nash  
Dalsan Properties, Inc.  
2001 Preston Road  
Plano, TX 75093

/s/ Henry P. (Toby) Long, III

Henry P. (Toby) Long, III

**EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
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Debtors.	:	Jointly Administered
	:	Judge Kevin R. Huennekens
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**ORDER PERMITTING WITHDRAWAL OF HUNTON & WILLIAMS LLP AS  
COUNSEL FOR PARKER CENTRAL PLAZA, LTD. AND GALLERIA PLAZA, LTD.**

Upon consideration of the Motion to Withdrawal as Counsel for Parker Central Plaza, Ltd. and Galleria Plaza, Ltd. (the "Motion") filed by Hunton & Williams LLP and it appearing to the Court that there is sufficient cause appearing therefore; it hereby is:

ORDERED that the Motion is granted; and

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

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ORDERED that Hunton & Williams LLP is permitted to withdraw as counsel of record for Parker Central Plaza, Ltd. and Galleria Plaza, Ltd. in these bankruptcy proceedings and such withdrawal hereby is approved.

Dated: Richmond, Virginia  
\_\_\_\_\_, 2011

\_\_\_\_\_  
United States Bankruptcy Judge

WE ASK FOR THIS:

/s/ Henry P. (Toby) Long, III  
Henry (Toby) P. Long III [VSB No. 75134]  
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**CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)**

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Henry P. (Toby) Long, III  
Henry P. (Toby) Long, III